

IN THE CIRCUIT COURT OF MADISON COUNTY, MISSISSIPPI

NAOMI FORD

PLAINTIFF

vs.

FILED
MADISON COUNTY CIVIL ACTION NO.: CT 2021-0110JM

WALMART, INC.

And JOHN DOES 1-10

DEFENDANTS

MAY 05 2021

ANITA WRAY, CIRCUIT CLERK
BY [Signature] D.C.

COMPLAINT
(JURY TRIAL REQUESTED)

COMES NOW the Plaintiff, NAOMI FORD (hereafter "Plaintiff"), by and through her attorney(s) of record, and hereby files this Complaint as follows:

PARTIES

1. The Plaintiff is an adult resident citizen of Madison County, Mississippi and presently resides at 711 Lake Harbor Drive, Apt 1071, Ridgeland, Mississippi, 39157.

2. The Defendant, Walmart, Inc. (hereafter "Walmart") is incorporated in the state of Delaware, doing business in the state of Mississippi that may be served with process of this Court through its registered agent CT Corporation System located at 645 Lakeland East Drive, Suite 101, Flowood, Mississippi 39232.

3. Defendants, John Does 1 – 10, are the owners, operators, managers, employees, agents, and all other entities, corporate and/or individuals, of Walmart who were in some manner negligently and proximately responsible for the events and happenings alleged in this Complaint and for the Plaintiff's injuries and damages.

EXHIBIT A

JURISDICTION AND VENUE

4. This Court has jurisdiction of the parties and the subject matter of this action. Venue is proper as this civil action arises out of negligent acts and omissions committed in Madison County, Mississippi, and the cause of action occurred and accrued in Madison County, Mississippi.

FACTS

5. The Plaintiff adopts and herein incorporates by reference each and every allegation as set forth above.

6. At all times mentioned in this Complaint, the Defendant, Walmart operated the store located at 815 S. Wheatley St. Ridgeland, Mississippi 39157.

7. At all times mentioned in this Complaint, the Defendant, Walmart, invited the general public, including the Plaintiff, to enter the premises of Walmart (Store # 875) located at 815 S. Wheatley St. Ridgeland, Mississippi 39157, for reasons mutually advantageous to both the Defendant, Walmart, Inc. and the Plaintiff.

8. On or about June 7, 2018, the Plaintiff was an invitee on the premises of Walmart, located at 815 S. Wheatley St. Ridgeland, Mississippi 39157.

9. At the above-mentioned time and place, the Plaintiff was walking on the premises of Walmart when, suddenly and without warning, she slipped on a substance on the floor and fell violently to the ground causing her to sustain serious injuries and damages.

10. The Defendant, Walmart, as owner and operator of the store where the Plaintiff was seriously injured, owed a duty to the Plaintiff to keep the premises in a reasonably safe condition, to warn the Plaintiff of any dangerous conditions not readily apparent of which it knew or should have known in the exercise of reasonable care, and

to conduct reasonable inspections to discover dangerous conditions existing on the premises.

11. The Defendant, Walmart, as owner and operator of the restaurant where the Plaintiff was seriously injured, breached the duties owed to the Plaintiff by:

(A) Failing to maintain the premises in a reasonably safe condition;

(B) Allowing the substance to come into contact with and remain on the premises when the Defendant, Walmart, knew, or in the exercise of reasonable care should have known, that the hazard created an unreasonable risk of harm to invitees in the store;

(C) Failing to warn the Plaintiff of the danger presented by the presence of the liquid and/or other substance on the premises;

(D) Failing to properly inspect the premises in order to discover hazardous conditions on the premises;

(E) Failing to otherwise exercise due care with respect to the matters alleged in this Complaint.

12. As a direct and proximate result of the negligence of the Defendant, Walmart, as set forth above, the Plaintiff slipped and fell while at the store.

13. As a further direct and proximate result of the negligence of the Defendant, Walmart, as set forth above, the Plaintiff sustained serious injuries and damages including but not limited to physical injuries; past, present, and future pain and suffering; past, present and future medical expenses; and other damages that will be proved at the trial of this matter.

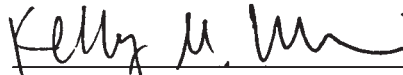
PRAYER FOR RELIEF

WHEREFORE PREMISES CONSIDERED, the Plaintiff requests a **jury trial** and demands damages including actual, compensatory, consequential, and incidental damages, for physical injuries; past, present and future physical and emotional pain and suffering, past, present and future medical expenses; and any other special damages that may be incurred by the Plaintiff, together with attorney fees, costs and any further relief as the court may deem proper.

Respectfully submitted this the 5th day of May, 2021.

NAOMI FORD

BY:



KELLY M. WILLIAMS. MSB# 104841

OF COUNSEL:

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ATTORNEYS FOR PLAINTIFF

FEE BILL, CIVIL CASES, CIRCUIT COURT

State of Mississippi
Madison County

Case # CI-2021-0110 Acct # Paid By CHECK 6421 Rct# 92000

CV CLERK'S FEE	85.00
CV LAW LIBRARY	2.50
CV COURT REPORTER TAX	10.00
CV COURT EDUCATION	2.00
CV COURT ADMINISTRATOR	2.00
CV CIVIL LEGAL ASSISTANCE FUND	5.00
CV COMPREHENSIVE ELECTRONIC CT	10.00
CV JURY TAX	3.00
CV CONSTITUENTS FE	.50
CV RECORDS MANAGEMENT PROGRAM	1.00
CV-JUDICIAL SYS OPERATION FUND	40.00

Total	\$	161.00
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Payment received from AAFRAM SELLERS

Transaction 96617 Received 5/ 5/2021 at 16:48 Drawer 1 I.D. DENDY

Current Balance Due	\$0.00	Receipt Amount \$	161.00
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By _____ D.C. ANITA WRAY, Circuit Clerk

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